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DNR Comments on EPA Draft Letter to
McDonnell Douglas Corporation

Comment # 2: Considering the size of this facility the department thinks that the inspection schedule is adequate. The department has reviewed the revision pages F-4, F-5, and F-6, which contain the necessary information and feels that incorporating that material on the inspection log would result in requiring at least one page per day instead of the monthly format. Apart from the logistics of the situation the department has no major problems with this comment.

Comment # 5: I'm not sure what incident of ruptured piping you are referring to in the comment. Are the "poly tanks" the (6) 750 gallon tanks or the (5) 500 gallon tanks? Either way, revision pages D-24, 1 of 9 and 2 of 9 indicate that the tanks are covered with loose-fitting (not sealed) covers. This information is also repeated on revision pages D-19 and D-20.

MDNR COMMENT TO BE ADDED

1. The revisions submitted with your letter to Mr. L. Harrington of September 12, 1983, indicate that some changes have been implemented in your tank storage capability. Particularly a 3,000 gallon carbon steel tank has been replaced by a 3,380 gallon fiberglass tank, an additional 2,000 gallon carbon steel tank has been activated, and a 4,380 gallon fiberglass has been placed into service.

While these tanks are exempt from regulation under 264.190(b) the Department has the following concerns:

- a) The Department has received information on various tanks, the overfill control, and leak detection systems, however; the information on the age of the various tanks is not complete. Please provide the following information in a tabular form; tank identification, capacity, contents, material of construction, overfill control, leak detection system, and date (month and year) that tank was placed into service. This information would be useful as a summary of the text found in sections C and D.



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- b) In you letter of October 12, 1983, to Mr. D. Wagoner in response to "EPA Statement 5" it is indicated that the hydrocarbon detection system is checked for functional operation every thirteen weeks. This information should be incorporated into the inspection procedures contained on revision pages F-6, 2 of 4 and 3 of 4.
- c) Partical closure of the facility is discussed on page I-2 of the application. Is there any planned removal of the existing underground tanks and replacement with fiberglass tanks, if not what criteria determines when these tanks are replaced?
- d) The revised closure cost estimates contained on revision page I-8 still indicate five underground tanks, please revise this to show the additional two tanks, also revise the cost estimate if necessary. The maximum inventory indicated on revised page I-3 appears to be in error, the titanium etch storage tank volume of 37,620 appears excessive for 6 tanks at 750 gallons each which would result in 4,500 gallons. Likewise is the maximum inventory of 100 pounds of storage in the explosive storage facility of building 10 accurate?



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